

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN re VIRGIN MOBILE USA IPO
LITIGATION

This document relates to:

ALL ACTIONS

LEAD CASE NO: 2:07-cv-10589-TPG

(SECURITIES CLASS ACTION)

2 WEST, INC., On Behalf of Itself and All
Others Similarly Situated,

Plaintiff,

V.

VIRGIN MOBILE USA, INC., DANIEL H. SCHULMAN, JOHN D. FEEHAN, JR., LEHMAN BROTHERS, INC., MERRILL LYNCH PIERCE FENNER & SMITH, INC. and BEAR STEARNS & CO., INC.

Defendants.

DOCKET NO.: 1:07-cv-11625-UA

**NOTICE OF NO OPPOSITION TO DEFENDANTS' NOTICE OF MOTION TO STAY
PROCEEDINGS PENDING RULING ON TRANSFER AND CONSOLIDATION BY
THE PANEL ON MULTIDISTRICT LITIGATION**

On January 22, 2008, Defendants filed a Notice of Motion to Stay Proceedings seeking an Order staying all proceedings in these actions as to all parties, pending a ruling by the Judicial Panel on Multidistrict Litigation on a currently-pending motion to transfer these actions, and the action pending in the United States District Court for the District of New Jersey, to a single Court for coordinated pretrial proceedings pursuant to 28 U.S.C. § 1407.

Movant, the Volpe Group, hereby does not oppose this Notice of Motion to Stay.

Dated: February 8, 2008

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this Notice was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on February 8, 2008.

/s/ Kim E. Miller
Kim E. Miller